

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MICHAEL GRECCO PRODUCTIONS, INC.)	
)	Civil No. 17-cv-1843-KBF
Plaintiff,)	
)	
v.)	
)	DECLARATION OF
WENN LIMITED, LLOYD RAYMOND BEINY,)	ANDERSON J. DUFF
CELEBITCHY LLC and SHEKNOWS LLC,)	
)	
Defendants.)	

1. I, Anderson J. Duff, am an attorney at The Law Offices of Anderson J. Duff, PLLC, counsel for Defendant Celebitchy LLC (“Celeb”).

2. On January 2, 2018, I first became aware that Defendant WENN Limited had made representations in another jurisdiction citing financial trouble and contemplating bankruptcy.

3. Immediately after learning of such filings, at 2:35 p.m. ET, I wrote an email to counsel for WENN stating in the pertinent part that Plaintiff’s counsel had “pointed out that attorneys for [WENN] recently withdrew from a similar case in Tennessee for lack of payment, and [that WENN’s] failure to respond to any discovery requests in this case is disconcerting.” I further stated that “[u]nless you and [Plaintiff’s counsel] confirm before the [close of business] today that this case is settling, we will file a motion to reopen discovery as to your client in light of this new information.”

4. On December 26, 2017, counsel for Celeb wrote to counsel for WENN stating “[w]hat is the status of settlement in this case? As you know, our client is expecting WENN to indemnify it from the damages at issue in this suit. To date, we have been extremely patient with WENN. Discovery closes, however, on January 8, and we need a hard answer on whether this

case is going to settle. If it is not going to settle before January 8, we need WENN to execute an indemnification agreement that states that it will bear all liability, including costs and attorneys' fees, arising out of this case. Please let us know by close of business tomorrow."

5. WENN response to Celeb's December 26, 2017 inquiry stated only that the parties were close to settlement.

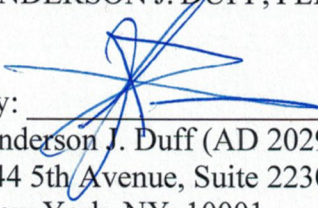
6. On January 2, 2018, Plaintiff's counsel notified counsel for Celeb that WENN had not yet responded to *any* discovery requests made by Plaintiff.

7. I have not received a response to my email referenced in paragraph 3 above.

8. All factual representations made herein are made upon my personal knowledge.

Dated: January 2, 2018
New York, New York

THE LAW OFFICES OF
ANDERSON J. DUFF, PLLC

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